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15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 Gary Tai, ShuiKee Company Limited, and Golden
18 Essence Global Limited,

19 Plaintiffs,

20 v.

21 JC Funding-5, LLC, Jeff N. Crossland, D-Design
22 LNO Inc., Leslie Dotson, Does I-X, and Roes
23 Corporation I-X,

24 Defendants.

25 Case No. 2:17-cv-02588-MMD-PAL

26 **Plaintiffs' Proposed Amended
27 Discovery Plan and Scheduling Order**

28 Plaintiffs Gary Tai, ShuiKee Company Limited, and Golden Essence Global Limited
29 (the "Plaintiffs")¹, by and though the undersigned counsel of record, files the following
30 Proposed Amended Discovery Plan and Scheduling Order in accordance with the Court's
31 Minute Order dated May 2, 2018 at Docket No. 31. That Minute Order ordered the parties to
32 a Proposed Amended Discovery Plan and Scheduling Order within 14 days after decision on
33 Defendant Jeffrey N. Crossland's Motion and Motion to Quash Summons of Service and
34 Complaint for Lack of Personal Jurisdiction; Memorandum of Points and Authorities at Docket

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37 ¹ This document is being filed on behalf of Plaintiffs only as their counsel was unable to obtain
38 consent to submission on behalf of the only remaining and non-defaulted Defendant Leslie
39 Dotson by the deadline Order by the Court.

1 No. 12 (“Motion to Quash”). On May 10, 2018, the Court issued its Order regarding the Motion
2 to Quash at Docket No. 32.²

I. PROPOSED DISCOVERY PLAN; APPLICABLE DEADLINES

A. Discovery Cut-Off Date:

1. **November 20, 2018** (180 days from the date this Proposed Amended Discovery Plan and Scheduling Order is due on May 24, 2018.

B. Amending the Pleadings and Adding Parties:

1. **August 22, 2018** (90 days prior to the close of discovery).

C. Fed. R. Civ. P. 26(a)(2) Disclosures (Experts):

1. Initial Expert Disclosures: **September 21, 2018** (60 days before the close of discovery)

2. Rebuttal Expert Disclosures: **October 21, 2018** (30 days after the initial disclosure of experts)

D. Dispositive Motions:

1. December 20, 2018 (30 days after the discovery cut-off date)

E. Joint Pretrial Order:

1. **January 19, 2019** (30 days after dispositive motion deadline)

- (a) In the event dispositive motions are filed, the deadline for filing the joint pretrial order shall be suspended until 30 days after decision on the dispositive motions or further order.

F. Fed. R. Civ. P. 26(a)(3) Disclosures

1. **January 19, 2019** (the date the joint pretrial order is submitted)

G. Interim Status Report:

² Due to the nature of the Motion to Quash, which was premised on lack of personal jurisdiction as asserted by Defendant Jeff N. Crossland (“Crossland”) and the difficulty of conducting discovery to assess the claims and defenses at issue in this matter without Crossland’s participation, the parties exchanged initial disclosures but postponed further discovery pending the ruling on Crossland’s Motion to Quash, which was submitted for approximately six months.

1. September 21, 2018 (60 days prior to the close of discovery)

H. Motions in Limine:

1. Motions in Limine: **30 days before trial**
 2. Responses to Motions in Limine: **14 days after service of the Motions in Limine**
 3. Replies will be allowed only with leave of the Court.

DATED this 24th day of May, 2018.

HOLLEY DRIGGS WALCH FINE WRAY PUZEY & THOMPSON

/s/ Andrea M. Gandara

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Attorneys for Plaintiffs Gary Tai, ShuiKee Company Limited, and Golden Essence Global Limited

IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE/
UNITED STATES MAGISTRATE JUDGE
DATED: June 1, 2018

1 CERTIFICATE OF SERVICE

2 I HEREBY CERTIFY that on this 24th day of May, 2018, I electronically filed the
3 **PLAINTIFFS' PROPOSED AMENDED DISCOVERY PLAN AND SCHEDULING**
4 **ORDER** using the CM/ECF system which will send a notice of electronic filing to all CM/ECF
5 registrants.

6 I further certify that, on the 24th day of May, 2018, and pursuant to FRCP 5(b), I
7 deposited for mailing in the U.S. Mail a true and correct copy of the aforementioned document,
8 postage prepaid and addressed to:

9 Leslie Dotson, Pro Se
10 201 Santa Monica Boulevard, Suite 300
11 Santa Monica, California 90401

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13 An Employee of Holley Driggs Walch
14 Fine Wray Puzey & Thompson

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